

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

UNITED STATES OF AMERICA
Plaintiff,

Vs.

SERGEI ZAKIROV
YOB: 1998
Russian Citizen

Defendant.

) Date of Arrest: 2/24/24
)
) Magistrate's Case No. **24-01289MJ**
)
) COMPLAINT FOR VIOLATION OF
) Title 18, United States Code,
) Section 201(b)(1)(a) and (b)(1)(c)
) Bribery of a Public Official
) Count One
)
)

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNT ONE

On or about February 24, 2024, within the District of Arizona, Sergei Zakirov, the Defendant did, directly and indirectly, offer and promise a thing of value to a United States Border Patrol Agent, with intent to induce him to do an act and omit to do an act in violation of his official duty, that is to pay the United States Border Patrol Agent \$1,000 in U.S. currency to receive favorable treatment during his immigration processing. In violation of Title 18, United States Code, Section 201(b)(1)(a) and (b)(1)(c) (Felony). (Bribery of a Public Official)

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

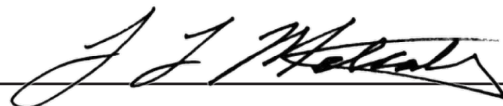
Authorized by: AUSA Ross Arellano Edwards

MATTHEW
DOMINGUEZ

Digitally signed by MATTHEW
DOMINGUEZ
Date: 2024.02.25 11:41:53 -07'00'

Matthew Dominguez
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to by telephone, February 26, 2024 at Yuma, Arizona.


The Honorable James F. Metcalf
United States Magistrate Judge

UNITED STATES OF AMERICA

v.

SERGEI ZAKIROV

Statement of Facts

I, Matthew Dominguez, Special Agent of the Federal Bureau of Investigation, being duly sworn, hereby deposes and states the following:

1. Location: United States Border Patrol Central Processing Center, **YUMA COUNTY, ARIZONA.**

2. UNDERLYING FACTS.

On February 23, 2024, at approximately 7:30 p.m. Border Patrol Agent (BPA) Benjamin Baldwin, stationed in Yuma, Arizona, was tasked to interview four Russian nationals, specifically two married couples, who had been detained for illegal entry in the United States on February 20, 2024. BPA Baldwin is a fluent Russian speaker.

BPA Baldwin interviewed the two female Russian nationals first and obtained two different stories regarding how they got to the United States and why they wanted to be in the United States. After noticing discrepancies in their statements, BPA Baldwin interviewed SERGEI ZAKIROV, husband of one of the female Russian nationals. ZAKIROV immediately expressed concerns regarding the duration of detention in the United States and questioned BPA Baldwin on the process for deportation. During the conversation, ZAKIROV began asking BPA Baldwin whether BPA Baldwin could assist them with expediting the detention process. BPA Baldwin advised ZAKIROV that he was solely there to assess their risk to national security. At that point, ZAKIROV leaned towards BPA Baldwin and with one hand rubbed his thumb and fingers together, making a clear gesture for money, and with his other hand raised it at an angle to attempt to conceal that gesture from any surrounding individuals and/or camera systems. ZAKIROV then stated, "maybe something can help you out" while making the money gesture.

BPA Baldwin ignored that gesture and comment and continued speaking to ZAKIROV. A few minutes later, as BPA Baldwin was returning ZAKIROV to his room, ZAKIROV stopped in a doorway, turned around and made the same, money, gesture with his hand. BPA Baldwin advised ZAKIROV that he was an American law

enforcement and not Russian law enforcement. ZAKIROV responded, "I saw you look at it" or "you thought about it." ZAKIROV then stated, "I've seen films." Thereafter, BPA Baldwin interrupted ZAKIROV mid-sentence and walked him through the doorway to his room. BPA Baldwin believes based on his training and experience that ZAKIROV was implying that he had seen corrupt American law enforcement in films/movies. BPA Baldwin then advised ZAKIROV to go back to his room before he gets in trouble.

BPA Baldwin immediately informed his supervisors, who in turn notified the Federal Bureau of Investigation (FBI). Your Affiant was assigned to investigate possible bribery.

At approximately 8:30 p.m., the four Russian nationals requested to speak with BPA Baldwin again and were adamant in only speaking to BPA Baldwin.

On February 24, 2024, at approximately 12:45 a.m., ZAKIROV was read his *Miranda* rights in the Russian language, understood them, and signed a copy that was provided to him in the Russian language. BPA Baldwin arrived to meet with ZAKIROV. When BPA Baldwin arrived, both BPA Baldwin and ZAKIROV left the area because ZAKIROV requested a cigarette to smoke in their initial conversation. As BPA Baldwin and ZAKIROV were turning the corner, ZAKIROV got within 5 inches of BPA Baldwin and whispered something. BPA Baldwin assumed it was in regards to the earlier gesture and comments however, BPA Baldwin advised ZAKIROV that there were cameras around and to "act normal" to which ZAKIROV backed up. After BPA Baldwin and ZAKIROV arrived at the smoking area, BPA Baldwin provided a cigarette to ZIKIROV and they then engaged in small talk.

After approximately 20 minutes of conversation, BPA Baldwin asked ZAKIROV why his wife had different statements from ZAKIROV regarding why/how they were in the United States. ZAKIROV expressed that his wife was nervous and stated, "you know how women are." BPA Baldwin advised ZAKIROV that he wanted to help him out, but he didn't know what he could do for him. At this point, ZAKIROV stated "how much money" in the Russian language and offered BPA Baldwin a number in Russian rubles. BPA Baldwin believed it was either 5,000 or 15,000 Rubles. BPA Baldwin advised ZAKIROV that it wasn't enough money and counter offered with \$1,000 in U.S currency (USD). ZAKIROV then agreed to pay BPA Baldwin \$1,000 USD and both parties shook hands. ZAKIROV then stated he would talk to his friend (the other male Russian national) about potentially getting him in on the deal. ZAKIROV also stated

that he would personally be giving BPA Baldwin the money. At this point, BPA Baldwin and ZAKIROV stopped talking and ZAKIROV was taken back to his room.

3. AFFIRMATION.

Based on the foregoing, there is probable cause to believe that SERGEI ZAKIROV committed the offense as alleged in the attached complaint.

**MATTHEW
DOMINGUEZ**

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DOMINGUEZ
Date: 2024.02.25 11:38:40 -07'00'

Matthew Dominguez
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to by telephone, February 26, 2024, at Yuma, Arizona.



The Honorable James F. Metcalf
United States Magistrate Judge

Weekend Probable Cause Statement

I, Matthew Dominguez, being duly sworn, do state the following:

The complainant states that this complaint is based upon statements in investigative reports by Border Patrol Agent (BPA) Benjamin Baldwin that on February 24, 2024, Sergei Zakirov was arrested for Bribery of a Public Official in violation of Title 18, United States Code, Section 201(b)(1)(a) and (b)(1)(c).

On February 23, 2024, at approximately 7:30 p.m. Border Patrol Agent (BPA) Benjamin Baldwin, stationed in Yuma, Arizona, was tasked to interview four Russian nationals, specifically two married couples, who had been detained for illegal entry in the United States on February 20, 2024. BPA Baldwin is a fluent Russian speaker.

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US v. SERGEI ZAKIROV

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Based on the foregoing, there is probable cause to believe that Sergei Zakirov committed the offenses as alleged in the Complaint.

Executed on: Date February 24, 2024 Time: 0045 hours.

Signed:

MATTHEW
DOMINGUEZ

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MATTHEW DOMINGUEZ
Date: 2024.02.25
11:39:22 -07'00'

Matthew Dominguez
Special Agent
Federal Bureau of Investigation

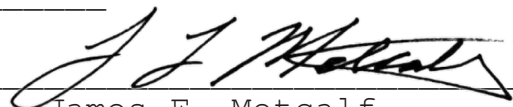
Finding of Probable Cause

On the basis of the facts presented in the foregoing Probable Cause Statement, consisting of three pages, I find probable cause to believe that the defendants named therein committed the offenses on the date 2/24/24, in violation of Title 18, United States Code, Section 201(b) (1) (a) and (b) (1) (c)

Finding Made on: Date 2/25/2024

Time 1415 hrs

Signed:



James F. Metcalf
United States Magistrate Judge